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ABBOTT LABORATORIES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SMITHKLINE BEECHEM CORPORATION,)
d/b/a GLAXOSMITHKLINE,)
Plaintiff,)
vs.)
ABBOTT LABORATORIES,)
Defendant.)

Case No. C 07-5702 CW
Related per November 19, 2007 Order to
Case No. C-04-1511 CW
ABBOTT LABORATORIES'
MISCELLANEOUS ADMINISTRATIVE
MOTION TO FILE CERTAIN
DOCUMENTS UNDER SEAL
Date: February 21, 2008
Time: 2:00 p.m.
Courtroom: 2 (4th Floor)
Judge: Hon. Claudia Wilken

I. NOTICE OF MOTION

TO PLAINTIFFS AND HIS ATTORNEY OF RECORD:

NOTICE IS HEREBY GIVEN Defendant Abbott Laboratories ("Abbott") will and hereby does move the Court for Miscellaneous Administrative Relief to file Exhibit A to the Declaration of Nicole M. Norris In Support Of Abbott's Motion To Transfer ("Norris Declaration"). Abbott's Motion for Miscellaneous Administrative Relief is based on this Notice of Motion and Motion, the Declaration of Nicole M. Norris filed herewith, and any further material and argument presented to the Court related to Abbott's Motion To Transfer Pursuant to 28 U.S.C § 1404(a).

II. BASIS FOR MOTION

In support of its motion, Abbott states that it has filed Exhibit A to the Norris Declaration under seal because it was produced by plaintiff GSK in the related case, *SEIU, et al v. Abbott Laboratories*, Case No. 04-1511, also pending before this Court. GSK produced the document pursuant to the protective order governing *SEIU, et al v. Abbott Laboratories*. Thus, Abbott files this document under seal pursuant to Local Rule 79-5(d) because of GSK's assertion of confidentiality.

III. CONCLUSION

In order to protect the confidential information of plaintiff, Abbott respectfully requests this Court grant Abbott's request to place Exhibit A to the Declaration of Nicole M. Norris In Support Of Abbott's Motion To Transfer Pursuant To 28 U.S.C. § 1404(a) under seal.

Dated: December 11, 2007

WINSTON & STRAWN LLP

By: /s/ Nicole M. Norris
 Nicole M. Norris
 Attorneys for Defendant
 ABBOTT LABORATORIES

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